

1 RENE L. VALLADARES  
2 Federal Public Defender  
3 Nevada State Bar No. 11479  
4 RAQUEL LAZO  
5 Assistant Federal Public Defender  
6 Nevada State Bar No. 8540  
7 411 E. Bonneville, Ste. 250  
8 Las Vegas, Nevada 89101  
9 (702) 388-6577/Phone  
10 (702) 388-6261/Fax  
11 Raquel\_lazo@fd.org

12 Attorney for Ramon Avendano-Soto

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 RAMON AVENDANO-SOTO AND  
19 JORGE ALFREDO SOTO,

20 Defendant.

21 Case No. 2:20-CR-003-APG-EJY

22 **STIPULATION TO CONTINUE**  
**REPLY DEADLINE TO**  
**GOVERNMENT'S RESPONSE TO**  
**MOTION TO COMPEL (ECF NO. 53)**  
(First Request)

23 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
24 Trutanich, United States Attorney, and Kevin Douglas Schiff, Assistant United States Attorney,  
25 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
and Raquel Lazo, Assistant Federal Public Defender, counsel for Ramon Avendano-Soto, and  
Christopher R. Oram, counsel for Jorge Alfredo Soto, that the reply deadline to the  
Government's Response (ECF No. 53) to Defendant's Motion to Compel (ECF No. 48)  
currently due August 19, 2020 be vacated and set to a date and time convenient to this Court,  
but no sooner than fourteen (14) days.

26 This Stipulation is entered into for the following reasons:

1       1. Defense counsel requires additional time to file a reply to the government's  
2 response. Defense counsel is currently preparing for upcoming evidentiary hearings in two  
3 cases – *United States v. Carter*, 19-cr-093-RFB, and *United States v. Brown*, 18-cr-18-089-  
4 RFB.

5       2. The defendants are not incarcerated and do not object to the continuance.

6       3. The parties agree to the continuance.

7       4. The additional time requested herein is not sought for purposes of delay, but  
8 merely to allow counsel for defendant sufficient time within which to be able to effectively  
9 prepare the reply.

10       5. Additionally, denial of this request for continuance could result in a miscarriage  
11 of justice.

12       This is the first request to continue the reply deadline date filed herein.

13       DATED this 14<sup>th</sup> day of August, 2020.

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15       RENE L. VALLADARES  
16       Federal Public Defender

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18       NICHOLAS A. TRUTANICH  
19       United States Attorney

20       /s/ *Raquel Lazo*  
21       By \_\_\_\_\_  
22       RAQUEL LAZO  
23       Assistant Federal Public Defender

24       /s/ *Kevin Douglas Schiff*  
25       By \_\_\_\_\_  
26       KEVIN DOUGLAS SCHIFF  
          Assistant United States Attorney

27  
28       /s/ *Christopher R. Oram*  
29       By \_\_\_\_\_  
30       CHRISTOPHER R. ORAM  
31       Counsel for Jorge Alfredo Soto

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

RAMON AVENDANO-SOTO AND  
JORGE ALFREDO SOTO,

Defendant.

Case No. 2:20-cr-00003-APG-EJY

## FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

## **FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defense counsel requires additional time to file a reply to the government's response. Defense counsel is currently preparing for upcoming evidentiary hearings in two cases – *United States v. Carter*, 19-cr-093-RFB, and *United States v. Brown*, 18-cr-18-089-RFB.

2. The defendants are not incarcerated and do not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively prepare the reply.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,

Case No. 2:20-CR-003-APG-EJY  
ORDER

RAMON AVENDANO-SOTO AND  
JORGE ALFREDO SOTO,  
Defendant.

## **ORDER**

IT IS THEREFORE ORDERED that defense counsel's Reply to the Government's Response (ECF No. 53) to Defendant's Motion to Compel (ECF No. 48) currently due on August 19, 2020 be vacated and continued to September 2, 2020.

DATED this 17th day of August, 2020.

Eugene J. Zouchah  
UNITED STATES MAGISTRATE JUDGE